



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

JMK:ALC  
F. #2016R00505

271 Cadman Plaza East  
Brooklyn, New York 11201

April 10, 2017

**BY HAND DELIVERY AND ECF**

The Honorable Dora L. Irizarry  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re:     United States v. Mark Nordlicht, et al.  
Criminal Docket No. 16-640 (DLI)

Dear Chief Judge Irizarry:

The government respectfully submits this letter in response to the letter of counsel for the defendant Mark Nordlicht (the “defendant”) filed on April 7, 2017 in the above-captioned case (the “April 7 Letter”). See ECF No. 107. At the March 27, 2017 status conference, the Court scheduled the next status conference for May 12, 2017 and indicated that, at that appearance, a motion briefing schedule would be set in the event that the defendant sought to pursue a motion relating to his allegations of unauthorized disclosure of grand jury material. Contrary to those directives, defense counsel filed the April 7 Letter. The government respectfully submits that, in lieu of inflammatory letters untethered to a motion, such as the April 7 Letter, the defendant should file a formal motion in which he seeks a specific remedy and provides the legal bases for his requested relief. Once he has done so, the government

respectfully requests that the Court set a briefing schedule, and the government will timely file a response to the defendant's motion.

Respectfully submitted,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ Alicyn L. Cooley  
Alicyn L. Cooley  
Lauren Howard Elbert  
Sarah M. Evans  
Assistant U.S. Attorneys  
(718) 254-6389 (Cooley)

cc: Clerk of the Court (DLI) (by ECF)  
William Burck, Esq. (by ECF and E-mail)